



County of Lincoln

Board of County Commissioners

Courthouse, Room 110

225 W. Olive St.

Newport, OR 97365

(503) 265-6611, Ext. 263

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May 3, 1993

Federal Communications Commission
1919 M Street
Suite 222
Washington, DC 20554

Re: Comments on Docket 92-235

To Whom It May Concern:

This is to express a concern about the potential impact of FCC Docket 92-235 on public safety radio users. It appears that it may have serious and costly effects nationwide on local emergency response systems. This is based on our evaluation of its impact here in Lincoln County, Oregon.

1. The whole concept seems to be questionable to begin with. Why require major, unnecessary changes to the public safety radio system, which ranks second in priority only to national defense, simply to create additional commercial radio channels?
2. The time table for implementation by January 1, 1996 is totally unrealistic when considering the fact that it will require major changes to most public safety radio systems.

Coverage will be reduced due to new limits on power which will require additional equipment; however, additional equipment will have to meet new requirements for bandwidth which will mean replacing all existing equipment because existing equipment is not compatible with the proposed bandwidth requirements.

3. Lincoln County is a moderate-size county with 990 square miles, but it will not be possible to obtain the necessary coverage for our radio systems with reduced power due to our mountainous terrain.

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4. Lincoln County, with a population of 40,000 to serve and with severe local budget constraints, cannot realistically afford to purchase a new radio system by January 1, 1996.

It would cost over \$150,000 for our Road and Sheriff's Office systems, just in replacement costs alone. This does not include estimated costs for additional equipment needed because of the limitations on power output.

We request that you delay implementation of this docket indefinitely and work with the Associated Public Safety Communications Officers, Inc. (APCO) to develop a proposal that will serve the public interest in maintaining the most viable public safety radio system possible.

Additionally, whenever the final product is implemented, a reasonable time frame for implementation needs to be provided so as not to create a negative impact on local government.

Very truly yours,

LINCOLN COUNTY BOARD OF COMMISSIONERS

By: Nancy E. Leonard
Nancy E. Leonard, Chair